



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMK/WMP
F. #2013R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 27, 2015

BY FEDEX

Amy Walsh, Esq.
Morvillo LLP
One World Financial Center, 27th floor
New York, New York 10281

Re: United States v. Robert Bandfield
Criminal Docket No. 14-476 (ILG)

Dear Ms. Walsh:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. The materials in this production are produced on one disc and are Bates stamped EDNY-IPC-000012194 – EDNY-IPC-000016448 and labeled EDNY-IPC-000016449 – EDNY-IPC-000016464. This disclosure supplements the government's earlier disclosures under cover of letters dated October 10, 2014, December 4, 2014, and March 4, 2015. The government again requests reciprocal discovery. The enclosed disc contains copies of the following materials:

- Bank of America account statements for Belize Bank International Ltd. account number 6550-8-26058 for January 2013 through June 2014 (Bates stamped EDNY-IPC-000012194 – EDNY-IPC-000013879);
- Bank of America account statements for Heritage International Bank and Trust Ltd. account number 1901-6-26059 for January 2013 through June 2014 (Bates stamped EDNY-IPC-000013880 – EDNY-IPC-000015921);
- Draft transcripts of video recordings of two meetings between the undercover agent and the defendant Robert Bandfield and his accomplices (Bates stamped EDNY-IPC-000015922 – EDNY-IPC-000016412); and
- PayPal account information, activity logs, and transactions logs for account numbers 8017, 1756, 5345, 4215, 7575, 5947, and 7662 (Bates stamped EDNY-IPC-000016413 – EDNY-IPC-000016448 and labeled EDNY-IPC-000016449 – EDNY-IPC-000016464).

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If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
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Enclosures

Cc: Clerk of Court (ILG) (by ECF) (w/o enclosures)